

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

EMERY STEVE BROWN

)

PLAINTIFF

)

VS.

)

CASE NO. 3:05-CV-0681-
MHT-CSC

CLAIMS MANAGEMENT, INC.

)

DEFENDANT

)

MOTION TO AMEND SCHEDULING ORDER

Comes now Plaintiff and moves the Court to amend the Scheduling Order previously entered in this case as follows:

1. The previous Scheduling Order entered in this case provided that discovery shall be commenced to be completed by May 1, 2006.
2. Due to various conflicts between the attorneys' schedules depositions were not able to be conducted until April of 2006 in the above matter. As a result of these depositions numerous other requests for production need to be filed in this case. These requests are being filed with the Defendant on May 4, 2006. Said Defendant would have through May 19, 2006, to respond.

3. Plaintiff respectfully requests that the previous Order requiring discovery to be completed by May 1 should be amended to allow discovery to be completed by June 1, 2006.

4. Plaintiff would further respectfully state that no prejudice would work to the Defendant by an amendment of the Scheduling Order as stated.

/s/ John A. Tinney TIN005
Attorney for Plaintiff
Post Office Box 1430
739 Main Street
Roanoke, Alabama 36274
(334) 863-8945

CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for the opposing party in the foregoing matter with a copy of this pleading by faxing or by depositing a copy of the same in the United States Mail, in an envelope with adequate postage prepaid thereon and properly addressed to him.

Jeffery A. Brown
Post Office Box 139
Columbus, Georgia 31902-0139

This 4th day of May, 2006.

/s/ John A. Tinney TIN005
Attorney for Plaintiff
Post Office Box 1430
Roanoke, Alabama 36274
334-863-8945